



Lockwood School District #26

Legendary Education, Lasting Foundation, Limitless Future!

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Chairman Ajit Pai
Federal Communications Commission
445 12th Street SW,
Washington, DC 20554

August 8, 2019

Dear Chairman Pai,

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate. Before delving into my response to the proposed changes, I want to thank the FCC for its continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

Lockwood Schools and many other Montana districts have been able to leverage the support from E-rate to offset the often times disproportionate costs in our rural state to make sure our students and teachers have both the access to and the infrastructure to utilize broadband. Significant bandwidth is no longer an option for schools; it is an absolute necessity. Our schools require significant bandwidth for numerous reasons: required testing puts the largest demand on our systems each year, we utilize online instructional and tutoring programs, Lockwood has for the most part moved away from traditional textbooks to more economic and up to date electronic resources, and our communications systems are all internet based. Any significant changes to E-Rate will have a direct impact in our classrooms.

The E-Rate program, and the broader USF program, is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role is the rapid and significant expansion of connectivity in schools, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

This proposed change would have a significant negative impact on both education and health care in rural states like Montana. These two areas need to work together in order to build upon one another, we know students learn better when their medical needs are addressed and that education is the key to improving our communities' overall health. For example, Montana has one of the highest suicide rates in the nation; this is a problem that requires schools and medical providers to work closely together, not compete for the same limited resources.

I am opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.

As an educator I have additional concerns about having Rural Health Care competing for the same USF funding. Medical inflation greatly outpaces the consumer price index. I foresee the portion of available funding shifting rapidly from our rural schools to the health care providers as their costs increase, eventually squeezing out funding for public schools. Additionally, most of the Rural Health Care providers I am familiar with are part of a larger health care network. These networks have the resources to have grant writers on staff. Most of Montana's School Districts have fewer than 100 students and operate on barebones staffing. More often than not it is the Superintendent seeking out grants and other alternate funding mechanisms. Keeping the E-Rate process simple and dependable is an important part of making sure our rural schools are able to continue to offer a world class education no matter where they are located or what the local tax base is.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband). A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

In closing, I reiterate my district's continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning. Thank you for considering these comments.

A handwritten signature in dark ink, consisting of a stylized 'T' followed by a long, sweeping horizontal line that curves slightly upwards at the end.

Tobin Novasio
Superintendent
Lockwood Schools